

**EXHIBIT A**

**AFFIDAVIT OF CHRISTOPHER A. ANDERSON**

1. I am an attorney admitted to practice law in Rhode Island and Massachusetts.
2. I represented the Sachem Passage Association, Inc. (the "Association") in the Rhode Island Superior Court action Sachem Passage Association, Inc. v. Francis G. Keough, III, No. W.C. 03-312.
3. Francis G. Keough, III ("Keough"), through his attorney, has extended an offer to purchase access to his property located in Charlestown, Rhode Island from the Association.
4. Any offer to purchase access from the Association would require approval of all members of the Association. At present, there are approximately 60 members of the Association.
5. During the litigation referenced in Paragraph 2 above, there was animosity between Keough and some members of the Association. I do not know who the members of the Association are at this time.

Signed under the penalties of perjury this 16<sup>th</sup> day of August 2007.



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